



**SMETS1 Consultation on the S1SPKI
Certificate Policy for FOC**

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1. Introduction and Context

In the initial stages of the smart meter roll-out across Great Britain, a number of energy suppliers installed first generation smart devices (known as SMETS1 devices), in consumers' premises. SMETS1 devices installed by one energy supplier, however, are not always interoperable with and supported by the systems used by another supplier. The Data Communications Company (DCC) has developed a plan and designed a solution for the incorporation of such devices into its national network. It provides important shared benefits for industry and consumers and intends to offer the ability for SMETS1 consumers to maintain their smart services following a decision to switch suppliers.

SEC Section L of the SEC sets out the arrangements that govern the Smart Metering Key Infrastructure (SMKI) which underpins the security of smart-meter related communications. In order to provide governance of the SMKI documentation and gain assurance of the DCC operation of the SMKI Services, the SMKI Policy Management Authority (SMKI PMA) was established under the SEC and serves as a Sub-Committee of the SEC Panel.

Depending on the SMETS1 Service Provider (S1SP), communications to SMETS1 devices from S1SPs are secured using either a dedicated, non SMKI PKI or by using symmetric keys. BEIS introduced changes that aligned the management of these S1SP PKIs and the symmetric keys under the aegis of the SMKI Policy Management Authority (SMKI PMA) and required the incorporation of relevant documentation into the SEC. This was to ensure a consistent set of oversight arrangements on the management of keys that are used as part of the secure end-to-end communication for SMETS1.

In this consultation DCC seeking views on a proposed S1SPKI Certification Policy for the FOC cohort.

2. FOC S1SPKI Certificate Policy

For the FOC S1SP, DCC is proposing to use a separate PKI to the existing versions in the SEC. As the PKI is an essential element of the end-to-end security of communications with their associated SMETS1 devices, BEIS placed this under the oversight of the SMKI PMA to provide a consistent set of oversight arrangements with SMKI. The result is that the certificate policies for the FOC PKI would, on incorporation into the SEC, need to be reviewed by the SMKI PMA in the same way that applies to the SMKI documentation. In practice the content of the Certificate Policy for FOC has been considered by the SMKI PMA and following on from changes that were made based on their recommendations, they have approved the policy for consultation.

Section L provides that the SMETS1 PKI should be assured in the same way that the SMKI PKIs and Infrastructure Key Infrastructures (IKIs) are assured. DCC previously consulted on an S1SPKM Compliance policy¹ which has been incorporated into the Smart Energy Code. DCC has reviewed the S1SPKM Compliance policy against the draft FOC S1SPKI certificate policy and is satisfied that it does not require any amendments. At the point that the FOC cohort goes live, this policy will be applicable to the FOC cohort. The SMETS1 PKI for FOC which DCC is seeking views on is the FOC S1SPKI Certificate Policy.

¹ <https://www.smartdcc.co.uk/customer-hub/consultations/skets1-consultation-on-the-smets1-public-key-infrastructure-pki/>

2.1. FOC S1SPKI Certificate Policy

Pursuant to Section L14.5 of the SEC, DCC is required to produce an S1SPKI Certificate Policy.

This Policy sets out the arrangements relating to the PKI that is used to secure communications in relation to the FOC cohort.

PKI Q1

Do you have any comments on the S1SPKI Certificate Policy for the FOC cohort?

3. Next Steps

Following the closure of this consultation, DCC will take into account respondents' views, and, subject to the consultation responses received, submit to the Department of Business, Energy and Industrial Strategy (BEIS) a version of the FOC S1SPKI Certificate Policy that it considers suitable for designation into the SEC by the Secretary of State.

DCC is aiming to provide a report to BEIS by 14 February 2021. DCC has discussed the designation of the FOC S1SPKI Certificate Policy with BEIS and it is proposed that, subject to timely receipt of DCC's report and copies of relevant stakeholder responses to this consultation, BEIS will designate the FOC S1SPKI Certificate Policy on 28 February 2021 or as soon as reasonably practicable within one month thereafter.

In order to expedite the designation of the S1SR, DCC is also seeking views on behalf of BEIS on the proposed date for designation of the FOC S1SPKI Certificate Policy as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

PKI Q2

Do you agree with the proposed designation date of 28 February 2021, or as soon as reasonably practicable within 1 month thereafter for the Certificate Policy for FOC?

4. How to Respond

Please provide responses by 1600 on 05 February 2021 to DCC at consultations@smartdcc.co.uk.

Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department of Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If BEIS or the Authority receive a request for disclosure of the information

we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.

5. Attachments

- Attachment 1 – Draft designation
- Attachment 2 – FOC S1SPKI Certificate Policy
- Attachment 3 – PKI_response_template_foc

Attachment 1

This attachment contains the text that BEIS plans to use for direction of changes to the SEC.

PKI for the FOC cohort Draft Direction Text

This direction is made for the purposes of the smart meter communication licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the "DCC Licence") and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the "SEC").

Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from [DD MM YYYY], the S1SPKI Certificate Policy for FOC will be designated and incorporated into the SEC as Appendix XX in the form set out in Annex [XX] to this direction.

This direction is also being notified to the SEC Administrator.